

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ERIC YOUNG, ADAM KURTZ, and DAVID
CRYSTAL on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW INC.,
TETHER HOLDINGS LIMITED, TETHER
LIMITED, DIGFINEX INC., TETHER
OPERATIONS LIMITED, TETHER
INTERNATIONAL LIMITED, AND JOHN DOES
1-50,

Defendants.

Civil Action No. 1:20-cv-00169 (KPF)
ECF Case
(Consolidated with Case Nos. 1:19-cv-
09236-KPF, 1:20-cv-00211-KPF, 1:20-cv-
00453-KPF)

Declaration of April D. Lambert in Support of Motion for Admission *Pro Hac Vice*

I, APRIL D. LAMBERT, of counsel at Radice Law Firm, P.C., located at 475 Wall Street, Princeton, NJ, 08540, duly admitted to practice before the Court of the State of Illinois, declare as follows:

1. I have personal knowledge of the matters stated herein and, if called upon, I could and would testify thereto. I submit this Declaration to the Court in support of my motion for admission *pro hac vice* to the United States District Court for the Southern District of New York for the purposes of the above pending action before this Court.
2. I am a member of good standing of the State of Illinois. A current Certificate of Good Standing issued by the State of Illinois is attached hereto as Exhibit A.
3. There are no pending disciplinary proceedings against me in any state or federal court.
4. I have never been convicted of a felony.

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 21st day of February, 2020.

/s/ April D. Lambert

APRIL D. LAMBERT